



BUCK OWENS PRODUCTION COMPANY, INC.

D. Webbink et al

94-123  
94-123

September 12, 1994

**RECEIVED**

**SEP 20 1994**

**FCC MAIL ROOM**

Renee Licht  
Federal Communications Commission  
Office Of Mass Media  
1919 M Street, NW  
Room 314  
Washington, DC 20554

KUZZ FM 107.9  
Fax 805.328.7535

KUZZ TV 45  
Fax 805.328.7576

KC&W AM 55  
Fax 805.328.7535

KTIE FM 107.1  
Fax 805.328.7535

HOME PREVIEW  
MAGAZINE  
Fax 805.328.7503

TARGET  
PRINT & MAIL  
Tel 805.325.3391

CAMERA ADS  
CLASSIFIEDS  
Tel 805.327.9803

KNIX FM 102.5  
Phoenix, AZ

KC&W AM 1580  
Phoenix, AZ

Dear Ms. Licht:

I understand that at its October meeting the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of station KUZZ, I strongly urge you to retain the "off-network" portion of the rule.

The off-network rule is vitally important to my station and is absolutely necessary to promote diversity and competition in local television markets. In fact, the off-network portion of the Prime Time Access Rule has been instrumental in creating a competitive independent television industry. It is also an essential element in the Commission's long held goal of creating new off-air television networks.

Without the off-network rule, independent stations will have a difficult time securing the rights to top quality off-network programming to air during the access period. This in turn will have a negative impact on my station's ability to finance programming for other dayparts, including local news and public affairs programming.

It is no secret that major changes are taking place in the broadcast industry. Mega mergers between the big three networks and major program producers appear to be on the horizon. With the big three networks poised to enter the off-network and first run syndication market, my station will have a difficult time obtaining the rights to programming. Eliminating the off-network rule may make it impossible. Without PTAR and the off-network portion of the rule, the American public will receive all of its programming from a few telecommunications giants. Such a result is not in the public interest.

No. of Copies rec'd  
List ABCDE

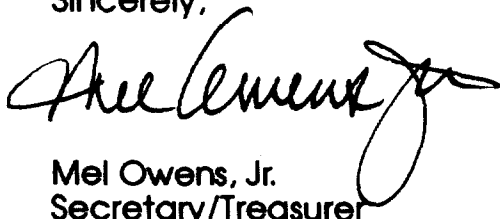
0

BUCK OWENS PRODUCTION COMPANY, INC.

If the FCC intends to examine this issue, it should do so in the context of a neutral Notice of Inquiry. At this time the FCC should not proceed directly to rule making. There are too many unresolved and complex issues which have not been discussed on the record.

Proposals to eliminate the off-network provision of PTAR will return us to a system where the three major networks can squeeze out independent producers and stifle competition from stations not affiliated with the big three networks. The Commission should not abdicate its responsibility to promote competition. Stations such as my own deserve a chance to compete. I urge you to proceed with extreme care and retain the off-network rule.

Sincerely,

A handwritten signature in black ink, appearing to read "Mel Owens, Jr.", with a stylized flourish at the end.

Mel Owens, Jr.  
Secretary/Treasurer

MO/cm



2065 Cantu Court • Sarasota, FL 34232

94-133

7-11-13

SEP 20 2 43 PM '94

RECEIVED

September 12, 1994

SEP 20 1994

FCC MAIL ROOM

Dear Chairman Hundt:

I understand that at its October meeting the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of station TV 62, I strongly urge you to retain the "off-network" portion of the rule.

The off-network rule is vitally important to my station and is absolutely necessary to promote diversity and competition in local television markets. In fact, the off-network portion of the Prime Time Access Rule has been instrumental in creating a competitive independent television industry. It is also an essential element in the Commission's long held goal of creating new off-air television networks.

Without the off-network rule, independent stations will have a difficult time securing the rights to top quality off-network programming to air during the access period. This in turn will have a negative impact on my station's ability to finance programming for other dayparts, including local news and public affairs programming.

It is no secret that major changes are taking place in the broadcast industry. Mega mergers between the big three networks and major program producers appear to be on the horizon. With the big three networks poised to enter the off-network and first run syndication market, my station will have a difficult time obtaining the rights to programming. Eliminating the off-network rule may make it impossible. Without PTAR and the off-network portion of the rule, the American public will receive all of its programming from a few telecommunications giants. Such a result is not in the public interest.

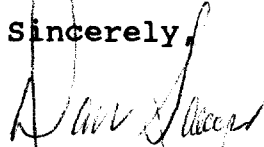
If the FCC intends to examine this issue, it should do so in the context of a neutral Notice of Inquiry. At this time the FCC should not proceed directly to rule making. There are too many unresolved and complex issues which have not been discussed on the record.

No. of Copies rec'd  
List ABCDE

8

Proposals to eliminate the off-network provision of PTAR will return us to a system where the three major networks can squeeze out independent producers and stifle competition from stations not affiliated with the big three networks. The Commission should not abdicate its responsibility to promote competition. Stations such as my own deserve a chance to compete. I urge you to proceed with extreme care and retain the off-network rule.

Sincerely,



Danford L. Sawyer Jr.  
President & General Partner  
DeSoto Channel 62 Associates, Ltd.

DLS/rlc



BUCK OWENS PRODUCTION COMPANY, INC.

94-123

RECEIVED

SEP 20 1994

September 12, 1994

FCC MAIL ROOM

KUZZ FM 107.9  
Fax 805.328.7535

KUZZ TV 45  
Fax 805.328.7576

KC&W AM 55  
Fax 805.328.7535

KTIE FM 107.1  
Fax 805.328.7535

HOME PREVIEW  
MAGAZINE  
Fax 805.328.7503

TARGET  
PRINT & MAIL  
Tel 805.325.3391

CAMERA ADS  
CLASSIFIEDS  
Tel 805.327.9803

KNIX FM 102.5  
Phoenix, AZ

KC&W AM 1580  
Phoenix, AZ

Bob Ratcliffe  
Federal Communications Commission  
Office Of Mass Media  
1919 M Street, NW  
Room 314  
Washington, DC 20554

Dear Mr. Ratcliffe:

I understand that at its October meeting the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of station KUZZ, I strongly urge you to retain the "off-network" portion of the rule.

The off-network rule is vitally important to my station and is absolutely necessary to promote diversity and competition in local television markets. In fact, the off-network portion of the Prime Time Access Rule has been instrumental in creating a competitive independent television industry. It is also an essential element in the Commission's long held goal of creating new off-air television networks.

Without the off-network rule, independent stations will have a difficult time securing the rights to top quality off-network programming to air during the access period. This in turn will have a negative impact on my station's ability to finance programming for other dayparts, including local news and public affairs programming.

It is no secret that major changes are taking place in the broadcast industry. Mega mergers between the big three networks and major program producers appear to be on the horizon. With the big three networks poised to enter the off-network and first run syndication market, my station will have a difficult time obtaining the rights to programming. Eliminating the off-network rule may make it impossible. Without PTAR and the off-network portion of the rule, the American public will receive all of its programming from a few telecommunications giants. Such a result is not in the public interest.

No. of Copies rec'd  
List ABCDE

8

BUCK OWENS PRODUCTION COMPANY, INC.

If the FCC intends to examine this issue, it should do so in the context of a neutral Notice of Inquiry. At this time the FCC should not proceed directly to rule making. There are too many unresolved and complex issues which have not been discussed on the record.

Proposals to eliminate the off-network provision of PTAR will return us to a system where the three major networks can squeeze out independent producers and stifle competition from stations not affiliated with the big three networks. The Commission should not abdicate its responsibility to promote competition. Stations such as my own deserve a chance to compete. I urge you to proceed with extreme care and retain the off-network rule.

Sincerely,

A handwritten signature in black ink, appearing to read "Mel Owens, Jr.", with a stylized flourish at the end.

Mel Owens, Jr.  
Secretary/Treasurer

MO/cm



BUCK OWENS PRODUCTION COMPANY, INC.

94-123

SEP 20 2 43 PM '94

RECEIVED

SEP 20 1994

FCC MAIL ROOM

September 12, 1994

KUZZ FM 107.9  
Fax 805.328.7535

KUZZ TV 45  
Fax 805.328.7576

KC&W AM 55  
Fax 805.328.7535

KTIE FM 107.1  
Fax 805.328.7535

HOME PREVIEW  
MAGAZINE  
Fax 805.328.7503

TARGET  
PRINT & MAIL  
Tel 805.325.3391

CAMERA ADS  
CLASSIFIEDS  
Tel 805.327.9803

KNIX FM 102.5  
Phoenix, AZ

KC&W AM 1580  
Phoenix, AZ

Ruth Dancey  
Federal Communications Commission  
Office Of Chairman Reed Hundt  
1919 M Street, NW  
Room 814  
Washington, DC 20554

Dear Ms. Dancey:

I understand that at its October meeting the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of station KUZZ, I strongly urge you to retain the "off-network" portion of the rule.

The off-network rule is vitally important to my station and is absolutely necessary to promote diversity and competition in local television markets. In fact, the off-network portion of the Prime Time Access Rule has been instrumental in creating a competitive independent television industry. It is also an essential element in the Commission's long held goal of creating new off-air television networks.

Without the off-network rule, independent stations will have a difficult time securing the rights to top quality off-network programming to air during the access period. This in turn will have a negative impact on my station's ability to finance programming for other dayparts, including local news and public affairs programming.

It is no secret that major changes are taking place in the broadcast industry. Mega mergers between the big three networks and major program producers appear to be on the horizon. With the big three networks poised to enter the off-network and first run syndication market, my station will have a difficult time obtaining the rights to programming. Eliminating the off-network rule may make it impossible. Without PTAR and the off-network portion of the rule, the American public will receive all of its programming from a few telecommunications giants. Such a result is not in the public interest.

No. of Copies rec'd  
List ABCDE

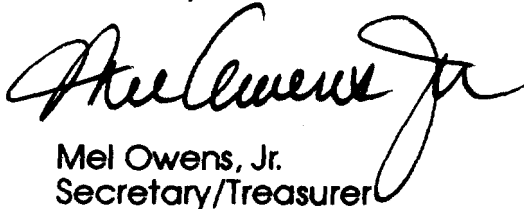
7

BUCK OWENS PRODUCTION COMPANY, INC.

If the FCC intends to examine this issue, it should do so in the context of a neutral Notice of Inquiry. At this time the FCC should not proceed directly to rule making. There are too many unresolved and complex issues which have not been discussed on the record.

Proposals to eliminate the off-network provision of PTAR will return us to a system where the three major networks can squeeze out independent producers and stifle competition from stations not affiliated with the big three networks. The Commission should not abdicate its responsibility to promote competition. Stations such as my own deserve a chance to compete. I urge you to proceed with extreme care and retain the off-network rule.

Sincerely,

A handwritten signature in black ink, appearing to read "Mel Owens Jr", written over the typed name and title.

Mel Owens, Jr.  
Secretary/Treasurer

MO/cm